

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	C.A. No. 16-122-LPS
	)	
Plaintiff,	)	<b>JURY TRIAL DEMANDED</b>
	)	
v.	)	
	)	
GROUPON, INC.	)	
	)	
Defendant.	)	

**IBM’S MOTION FOR SUMMARY JUDGMENT OF NO ANTICIPATION BY MORRIS  
AND NO OBVIOUSNESS IN VIEW OF MORRIS AND XEROX STAR FOR THE  
ASSERTED CLAIMS OF U.S. PATENT NO. 5,796,967**

Plaintiff International Business Machines Corporation (“IBM”) hereby moves for summary judgment of no anticipation by Morris and no obviousness in view of Morris and Xerox Star for the asserted claims of U.S. Patent No. 5,796,967. Attached hereto is a proposed order granting summary judgment of no anticipation by Morris and no obviousness in view of Morris and Xerox Star for the asserted claims of U.S. Patent No. 5,796,967. The grounds for IBM’s motion are set forth in its brief in support filed concurrently herewith.

Respectfully submitted,

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